

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re  CENTER CITY HEALTHCARE, LLC d/b/a HAHNEMANN UNIVERSITY HOSPITAL, <i>et al.</i> , <sup>1</sup>  Debtors.	Chapter 11  Case No. 19-11466 (MFW)  (Jointly Administered)
CENTER CITY HEALTHCARE, LLC, d/b/a HAHNEMANN UNIVERSITY HOSPITAL, ST. CHRISTOPHER'S HEALTHCARE, LLC, TPS V OF PA, LLC, and SCHC PEDIATRIC ASSOCIATES, LLC,  Plaintiffs,  v.  DE LAGE LANDEN FINANCIAL SERVICES, INC.,  Defendant.	         Adv. No. 21-50896 (MFW)

**STIPULATION EXTENDING PRE-TRIAL DATES AND DEADLINES**

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs Center City Healthcare, LLC d/b/a Hahnemann University Hospital, St. Christopher's Healthcare, LLC, TPS V of PA, LLC, and SCHC Pediatric Associates, LLC ("**Plaintiffs**") and Defendant De Lage Landen Financial Services, Inc. ("**Defendant**"), by and through their undersigned counsel, that the following dates and deadlines set forth in the *Order Establishing Streamlined Procedures Governing Adversary Proceedings Brought by Debtors Pursuant to Sections 502, 547, 548 and*

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Center City Healthcare, LLC (3341), Philadelphia Academic Health System, LLC (8681), St. Christopher's Healthcare, LLC (8395), Philadelphia Academic Medical Associates, LLC (8165), HPS of PA, L.L.C. (1617), SCHC Pediatric Associates, L.L.C. (0527), St. Christopher's Pediatric Urgent Care Center, L.L.C. (6447), SCHC Pediatric Anesthesia Associates, L.L.C. (2326), StChris Care at Northeast Pediatrics, L.L.C. (4056), TPS of PA, L.L.C. (4862), TPS II of PA, L.L.C. (5534), TPS III of PA, L.L.C. (5536), TPS IV of PA, L.L.C. (5537), and TPS V of PA, L.L.C. (5540). The Debtors' mailing address is 216 North Broad Street, 4th Floor, Philadelphia, Pennsylvania 19102.

550 of the Bankruptcy Code entered by the Court on September 21, 2021 [Docket No. 10], as amended by the parties' *Stipulation Extending Pre-Trial Dates and Deadlines* [Docket No. 24] filed on May 19, 2022, shall be extended as follows:

<b><u>Description</u></b>	<b><u>Stipulated Deadline</u></b>	<b><u>New Deadline</u></b>
Last day for all non-expert fact discovery including depositions of fact witnesses	June 30, 2022	July 31, 2022
Disclosures and reports of (a) the parties for any issue on which they bear the burden of proof (not including any report by Plaintiffs on insolvency) and (b) if Defendant intends to provide expert testimony regarding insolvency of the Debtors due.	August 1, 2022	August 31, 2022
Disclosures and reports (a) of the parties' rebuttal experts, and (b) Plaintiffs' report on the insolvency of the Debtors, if any, due	August 31, 2022	September 30, 2022
All expert discovery due including depositions	October 31, 2022	November 30, 2022
Last day to file and serve dispositive motions	November 30, 2022	December 31, 2022

*[Signature page to follow]*

**SAUL EWING ARNSTEIN & LEHR LLP**

/s/ John D. Demmy

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Dated: June 10, 2022